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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANCHOR SALES & MARKETING, INC.,

15-cv-4442 (RA)

Plaintiff,

- against -

NOTICE OF MOTION

RICHLOOM FABRICS GROUP, INC.,

Defendant.

PLEASE TAKE NOTICE that upon the Memorandum of Law in support hereof dated August 7, 2015 (the "Memo of Law"), the Declaration of Gerard F. Diebner, dated August 5, 2015, the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, Defendant Richloom Fabrics Group, Inc. will move this Court before the Honorable Ronnie Abrams, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007 in Courtroom 1506, at a date and time to be determined by the Court for an Order pursuant to Fed. R. Civ. P. 12 dismissing the Complaint, or, in the alternative granting Defendant's motion for a more definite statement, on the grounds, and for the reasons, set forth in the Memo of Law.

Dated: New York, New York

August 7, 2015

TANNENBAUM, HELPERN, SYRACUSE & HIRSCHTRITT LLP

By s/L. Donald Prutzman

L. Donald Prutzman Gerard F. Diebner 900 Third Avenue New York, New York 10022 (212) 508-6700

Attorneys for Defendant